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12 Attorneys for
13 *Michael Lamberts and Martha Lamberts*

14 UNITED STATES BANKRUPTCY COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 **In re:**

18 **PG&E CORPORATION,**

19 **&**

20 **PACIFIC GAS AND ELECTRIC**
21 **COMPANY,**

22 **Debtors.**

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Case No. 19-30088
Chapter 11
(Lead Case)

**DECLARATION OF MICHAEL S. DANKO
IN SUPPORT OF MOTION FOR ORDER
AUTHORIZING WITHDRAWAL OF
COUNSEL**

1 I, Michael S. Danko, declare as follows:

2 1. I am an attorney duly admitted to practice before all courts of the State of
3 California, including the Northern District.

4 2. I am an attorney with Danko Meredith ("Firm"), attorney of record for Bankruptcy
5 claimants, Michael Lamberts and Martha Lamberts.

6 3. I am informed and believe that facts set forth in this Declaration are true of my
7 personal knowledge, and if called upon to do so I could and would competently testify to these
8 facts.

9 4. On November 16, 2018, Michael and Martha Lamberts signed a retainer
10 agreement ("Agreement") with the Firm, engaging the Firm for legal representation to
11 prosecute their legal action against PG&E Corporation and Pacific Gas and Electric Company
12 for damages caused by the Camp Fire.

13 5. On November 19, 2018, the Firm filed Mass Tort Complaint on behalf of
14 Michael and Martha Lamberts in San Francisco County Superior Court, Tom Reinert v. PG&E
15 Corporation, A California Corporation, case no. CGC-18-571432.

16 6. On January 29, 2019, PG&E Corporation and Pacific Gas and Electric Company
17 ("Debtors") filed voluntary petitions for bankruptcy under Chapter 11 of Title 11 of the United
18 States Code, initiating bankruptcy case number 19-30088 in the Bankruptcy Court for the
19 Northern District of California, San Francisco Division ("Bankruptcy Case").

20 7. On October 15, 2019, the Firm filed claim no. 66484 on behalf of Michael
21 Lamberts and claim no. 66339 on behalf of Martha Lamberts.

22 8. On December 20, 2019, the Firm filed amended claim no. 91554 on behalf of
23 Martha Lamberts.

24 9. On September 25, 2020, Michael Lamberts spoke with a member of my staff
25 and as a result of that conversation it appeared to clear to me that the attorney-client
26 relationship had broken down irreconcilably.

27 10. On September 27, 2020, I spoke with Michael Lamberts personally. As a result
28 of that conversation, it was clear to me that the attorney-client relationship had indeed broken

1 down irreconcilably and that, furthermore, ethical consideration required the Firm's
2 withdrawal.

3 11. On September 29, 2020, per their representations that they were obtaining new
4 counsel, the Firm sent Michael and Martha Lamberts the Updated Attorney Representation
5 Forms.

6 12. There has been no contact from either Michael or Martha Lamberts since
7 September 27, 2020.

8
9 I declare under penalty of perjury that the foregoing is true and correct. Executed on
10 October 27 2020.

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13 Michael S. Danko
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